

## United States District Court

SOUTHERN

DISTRICT OF

TEXAS

McALLEN DIVISION

UNITED STATES OF AMERICA

V.

Norma Leticia Saenz

A087 434 795

United States

PRINCIPAL

YOB:

1981

United States District Court  
Southern District of Texas  
FILED

## CRIMINAL COMPLAINT

Case Number:

M-14-1943-M

OCT 05 2014

Clerk of Court

(Name and Address of Defendant)

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about October 3, 2014 in Starr County, in the Southern District of Texas defendants(s) did,  
(Track Statutory Language of Offense)

knowing or in reckless disregard of the fact that Noe Evaristo Zapata, citizen and national of Guatemala, Juan Miguel Barrientos-Pino, citizen and national of the United Mexican States, and six (6) other citizens of Mexico and Guatemala for a total of eight (8) who had entered the United States in violation of law, did knowingly transport, or move or attempts to transport said aliens in furtherance of such violation of law within the United States, that is, from a location near Rio Grande City, Texas to the point of arrest near Rio Grande City, Texas.

in violation of Title 8 United States Code, Section(s) 1324(a)(1)(A)(ii) FELONY

I further state that I am a(n) U.S. Senior Border Patrol Agent and that this complaint is based on the following facts:

On October 3, 2014, Agents Moreno and Selby received information from a concerned citizen regarding a blue van transporting possible illegal aliens eastbound on Expressway 83, from Rio Grande City, Texas. Agents noticed a van matching the description and decided to take a closer look. As they drove next to the vehicle, the driver and front passenger failed to make eye contact and the rear occupants of the vehicle were crouching low in their seats. Agents activated their emergency equipment and performed a traffic stop for an immigration inspection.

The driver, identified as Norma Leticia SAENZ, a USC, advised she was traveling to McAllen, Texas to drop off a 3-year-old child with his mother. The child was travelling in the back seat. She stated the passenger was her niece and the two adult males in the back seat were friends of hers, but she did not know their names. She then stated she had just met them walking along the expressway and agreed to give them a ride to McAllen.

SEE ATTACHED:

Continued on the attached sheet and made a part of this complaint:

☒ Yes ☐ No

Signature of Complainant

Sworn to before me and subscribed in my presence,

October 5, 2014

Date

Dorina Ramos

Name and Title of Judicial Officer

, U. S. Magistrate Judge

Derek Conrow

Senior Patrol Agent

Printed Name of Complainant

at McAllen, Texas

City and State

Signature of Judicial Officer

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
McALLEN, TEXAS**

**ATTACHMENT TO CRIMINAL COMPLAINT:**

**M-14-1943-M**

**RE: Norma Leticia Saenz**

**A087 434 795**

**CONTINUATION:**

Agent Moreno performed an immigration inspection on the occupants of the vehicle. The two adult males in the back seat and the passenger in the front seat all admitted to being in the United States illegally. All subjects were then transported to the Rio Grande City border Patrol Station for processing.

**NOTE:** The 3 year old USC was released to his USC mother at the station.

**PRINCIPAL'S STATEMENT:**

Norma Leticia SAENZ was read her Miranda Rights and agreed to give a statement without the presence of an attorney.

SAENZ stated she was traveling to McAllen, Texas to drop the 3-year-old boy off with his mother, when two men waived her down on Expressway 83. She stated she was going to be paid \$100 per alien she delivered to Eduardo Rios in Mission, Texas.

Saenz also told agents she was housing five other illegal aliens in a trailer next to her house. Saenz gave agents permission to enter the property. Agents arrived at 166 Jesus Javier Rd., and found 5 additional illegal aliens.

**MATERIAL WITNESSES' STATEMENTS:**

Both material witnesses were read their rights and agreed to provide a statement without the presence of an attorney.

1- Noe Evaristo Zapata, is a citizen and national of Guatemala. He stated he paid a smuggler \$2,500 to be smuggled to Houston, Texas. Evarista claimed he was taken to an abandoned house after crossing the river. There, he fell asleep, and when he woke up, a woman driving a blue van arrived and asked them if they needed a ride. After being stopped by Border Patrol, the woman told Evarista and the other smuggled alien to say they asked her for a ride. Evarista identified Norma Leticia Saenz in a photo lineup as the driver of the blue van.

2- Juan Miguel Barrientos-Pino, is a citizen and national of Mexico. He stated he paid a smuggler \$3,000 USD to be smuggled to Houston, Texas. Barrientos told agents, after crossing the river, he was taken to an abandoned house. He was told to wait there for someone to pick him up. He took a nap, and when he awoke, there were additional people that were not there before. Barrientos told agents he saw the woman arrive twice daily and deliver food. She would take 3-4 aliens out at a time. Once, she told Barrientos to wait a little longer for his turn to leave. Border Patrol then arrived at the house and apprehended him. Barrientos identified SAENZ as the driver of the blue van